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Attorneys for GOOGLE LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

SONOS, INC.,

Plaintiff.

VS

GOOGLE LLC

Defendant

Case No. 3:20-cv-06754-WHA
Consolidated with Case No. 3:21-cv-07559-WHA

**DECLARATION OF LINDSAY
COOPER IN SUPPORT OF GOOGLE
LLC'S BILL OF COSTS**

1 I, Lindsay Cooper, declare as follows:

2 1. I am a member of the bar of the State of California and a Partner at Quinn Emanuel
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Defendant”) in the above-
4 captioned matter.

5 2. I make this Declaration in support of Google’s Bill of Costs. I have personal
6 knowledge of the facts set forth in this declaration and, if called as a witness, could and would
7 competently testify to the matters set forth herein.

8 3. I have reviewed Google’s concurrently filed Bill of Costs and invoices for the costs
9 submitted herewith. The costs included in Google’s Bill of Costs are correctly stated and were
10 necessarily incurred in this litigation, and the services for which fees have been charged were
11 actually and necessarily performed. The costs are attributable to Google’s defense in this litigation,
12 were actually paid by Google, and I believe are recoverable by Google.

13 4. Pursuant to Civil L.R. 54-3(a)(1), Google seeks fees for case filing and docket fees
14 in the amount of \$900.00. Attached hereto as **Exhibit A-1** are true and correct copies of invoices
15 associated with the filing fees being sought by Google.

16 5. Pursuant to Civil L.R. 54-3(a)(2), Google seeks costs for service of motion-related
17 papers and delivery of chamber’s copies to the Court in the amount of \$8,475.75. Attached hereto
18 as **Exhibit A-2** are true and correct copies of invoices associated with these costs being sought by
19 Google.

20 6. Pursuant to Civil L.R. 54-3(b), Google seeks fees for reporters’ transcripts obtained
21 for an appeal, including trial transcripts and transcripts for hearings relevant to appealable issues, in
22 the amount of \$16,858.20. Attached hereto as **Exhibit B-1** are true and correct copies of invoices
23 associated with the reporters’ transcript costs being sought by Google.

24 7. Pursuant to Civil L.R. 54-3(c)(1), Google seeks deposition transcript costs in the
25 amount of \$59,648.70 (not including real-time fees, rush transcript fees, or any fees associated with
26 creating video recordings of the deposition). Attached hereto as **Exhibit C-1** are true and correct
27 copies of invoices associated with the deposition transcript costs being sought by Google.

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8. Pursuant to Civil L.R. 54-3(c)(3), Google seeks deposition exhibit costs in the amount of \$11,897.70 (excluding any costs associated with sharing exhibits virtually during a deposition). Attached hereto as **Exhibit C-3** are true and correct copies of invoices associated with the deposition exhibit costs being sought by Google.

5 9. Pursuant to Civil L.R. 54-3(d)(2), Google seeks e-discovery costs associated with the
6 production and/or reproduction of formal discovery documents by Quinn Emanuel Urquhart and
7 Sullivan LLP’s in-house Litigation Technology and Support Team (“LTAS”) in the amount of
8 \$21,581.25. Attached hereto as **Exhibit D-2** are true and correct copies of invoices associated with
9 the discovery costs being sought by Google. Attached as **Exhibit D-3** are true and correct copies
10 of the Stipulated Orders Re: Discovery of Electronically Stored Information filed in each of the
11 consolidated cases.

12 10. Pursuant to Civil L.R. 54-3(d)(4), Google seeks costs for reproducing trial exhibits
13 in the amount of \$5,419.91. Attached hereto as **Exhibit D-4** are true and correct copies of invoices
14 associated with the trial exhibit costs being sought by Google.

15 11. Pursuant to Civil L.R. 54-3(d)(5), Google seeks costs for preparation of visual aids
16 by third-party vendor Evoke related to the in-court timeline requested by the Court for trial in the
17 amount of \$1,560.00. Attached hereto as **Exhibit D-5** are true and correct copies of the invoices
18 associated with the visual aid costs being sought by Google, redacted to exclude entries that may
19 not pertain to the preparation of the timeline and are, thus, conservatively not being sought as
20 recoverable costs.

21 12. Based on the foregoing, Google seeks costs in the total amount of \$126,341.51.

22 I declare under penalty of perjury that the foregoing is true and correct. Executed on
23 November 7, 2023 in Mill Valley, California.

/s/ Lindsay Cooper
Lindsay Cooper

ECF ATTESTATION

2 I, Sean Pak, am the ECF User whose ID and password are being used to file this Declaration.
3 In compliance with Civil Local Rule 5-1, I hereby attest that Lindsay Cooper has concurred in this
4 filing.

5 || Dated: November 7, 2023

By: /s/ Sean Pak
Sean Pak